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JUL - 8 2019  
U.S. District Court  
Eastern District of MO

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
NORTHERN DIVISION

JANE DOE, by her next friend  
Anthony E. Rothert,

Plaintiffs,

v.

MICHELLE CHAPMAN, in her official  
Capacity as Circuit Clerk of Randolph  
County, Missouri,

Defendant.

No. 2:19-cv-25 CDP  
**Currently a Sealed Matter**

**Joint Motion for Protective Order**

Pursuant to Fed. R. Civ. P. 26(c), the parties jointly request that the Court enter their proposed protective order. In support, they state:

1. This action was filed on March 25, 2019, and has been sealed temporarily.
2. Plaintiff moved for leave to proceed under a pseudonym in this action, which leave was granted by the Court.
3. The Court issued a temporary restraining order on June 18, 2019, prohibiting Defendant from disclosing Plaintiff's name or her identifying characteristics to anyone other than the Court and finding that without that prohibition, Plaintiff would face a "real, substantial threat of irreparable harm . . . including the loss of the anonymity she is constitutionally entitled to and the withdrawal of the financial and emotional support of her parents."
4. That order, which was extended for one week, will expire on July 9, 2019, unless extended by the Court. *See* Fed. R. Civ. P. 65(b)(2).

5. Upon the expiration of that order, and in accordance with Fed. R. Civ. P. 26(c)(1), good cause will exist to forbid the disclosure of Plaintiff's identity in order to protect her from embarrassment and oppression. Without a protective order, Plaintiff faces a substantial threat of her identity being revealed, which among other things is substantially likely to cause her financial and emotional harm and to prevent her from being able to prosecute this action.
6. The parties have conferred in good faith to reach this agreed-upon proposed protective order. *See id.*

WHEREFORE, the parties jointly and respectfully request that the Court enter their proposed protective order, attached hereto as Exhibit A.

Respectfully submitted,

/s/ Anthony E. Rothert  
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